

SO ORDERED

s/James B. Clark

CRAIG A. SQUITIERI

ATTORNEY AT LAW
MEMBER OF NEW JERSEY BAR
MEMBER OF NEW YORK BAR

James B. Clark, U.S.M.J.

Date: *5/21/2024*

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May 20, 2024

VIA ECF

The Honorable James B. Clark, III
United States District Court of New Jersey
Court Room MLK 2A
50 Walnut Street
Newark, New Jersey 07102

**The parties are directed to meet and confer and attempt to resolve their disputes. If issues remain, the parties shall submit a joint letter of five (5) pages or less setting forth all outstanding disputes along with the parties' respective positions by June 3, 2024. The court will address the parties' letter during the June 6, 2024 telephone conference.*

Re: Christina Flores v. Paradise Trips, LLC, et als
Case No.: 2:23-cv-22894-EP-JBC

Dear Judge Clark:

On May 6, 2024, I wrote to the Court regarding defendants Rush Enterprises, Inc., Rush Truck Leasing, Inc., PACCAR Inc. and PACCAR Leasing Corporation responses to paper discovery.

Thereafter, Mr. Perrelli on May 10, 2024 responded to my letter and advised the Court that "[w]hile Counsel may be dissatisfied with the results of responses, the aforementioned Defendants have turned over each and every document in their possession." Mr. Perrelli's May 10, 2024 response does not resolve the numerous issues outlined in my April 29, 2024 correspondence to him. (See Exhibit "G" of May 6, 2024 letter to Court).

Furthermore, Mr. Perrelli also represents defendants James John (truck driver), Paradise Trips, LLC (motor carrier) and Esther Kubrock Dubosque (owner of trailer attached to truck and principal of Paradise Trips, LLC). Those defendant responses to interrogatories and notice to produce, which were served on March 26, 2024, were due by May 8, 2024 pursuant to the Court's February 21, 2024 Scheduling Order. We still have not received those responses.

Accordingly, I am respectfully seeking a phone conference with the Court so that we may resolve the outstanding discovery dispute and delinquent discovery from Mr. Perrelli.

I am available at the Court's convenience.

Respectfully submitted,

/s/ Craig A. Squitieri

Craig A. Squitieri

cc: William Perrelli, Esq.
Joseph Monaco, Esq.
D. Scott Conchar, Esq.
Matthew E. Kennedy, Esq.

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